

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**In Re: Methyl Tertiary Butyl Ether (“MTBE”)  
Products Liability Litigation**

**Master File No. 1:00-1898  
MDL No. 1358 (SAS)  
M21-88**

**This Document Relates To:**

*City of Lowell v. Amerada Hess Corp., et al.*, Case  
No. 05-CV-04018  
*Town of Duxbury, et al. v. Amerada Hess Corp.,*  
Case No. 04-CV-1725

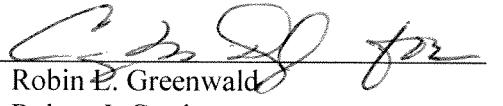
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**NOTICE OF JOINT MOTION TO  
DISMISS**

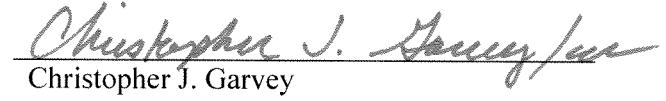
Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs and Settling Defendants, Global Companies LLC, Global Montello Group LLC, Chelsea Sandwich LLC, Global Revco Dock LLC, and Global Petroleum Corporation (“the Settling Defendants”) (collectively “the Parties”), move the Court to enter agreed Stipulations and Orders of Dismissal with Prejudice in each of these cases. The Parties have agreed to a settlement agreement and final resolution of all matters in controversy between them, including the settlement of the above cases, and executed Stipulations of Dismissal. The Parties have agreed that each shall bear their own costs, expenses, and attorneys’ fees.

WHEREFORE, the Parties request that this Court enter the attached Stipulations and Orders of Dismissal with Prejudice under Rule 41 of the Federal Rules of Civil Procedure, costs and expenses to be borne by the party incurring them, and for such other relief to which they may be entitled.

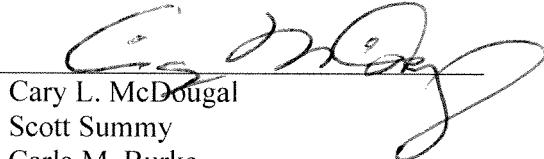
DATED: May \_\_, 2009

  
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Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2009, a true and correct copy of foregoing NOTICE OF JOINT MOTION TO DISMISS was electronically served on all counsel via LexisNexis File & Serve and via liaison counsel distribution lists.

*/s/ Christopher J. Garvey*  
Christopher J. Garvey